



Pasco Landfill  
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to:  
Rod Lobos  
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From: "George, Dave (ECY)" <CGEO461@ECY.WA.GOV>  
To: Rod Lobos/R10/USEPA/US@EPA,

Rod,

There are two main concerns with the NoVOCs treatment system at the Pasco Landfill:

1. The ability of the NoVOCs system to effectively treat the groundwater such that cleanup levels can be met at the point of compliance within a reasonable restoration time frame. Data gathered over the last five years (the performance monitoring period) indicates that the system is not capable of treating the VOCs below concentrations necessary to meet cleanup levels at the point of compliance. Additional system enhancements or supplemental treatment will be needed.
2. The ability of the NoVOCs system - and to an extent, the SVE - to address on-going/future source-strength-increases (i.e., "catastrophic" drum failures). During the last two years of the monitoring period, an increase in source strength from Zone A was observed. That increase in VOC groundwater concentrations appears to have moved beyond the NoVOCs treatment line, resulting in increased down-gradient VOC concentrations.

In general, the PLPs' technical responses to our review comments did not, in our view, provide substantive data to support their arguments. Their interpretations and arguments have been generally conflicting within the same document and are lacking in hard, supporting data. We are now at the point where the PLP group will be meeting internally in September 2007 (likely the 10th) to discuss how they will address our concerns. They plan to submit a draft work plan for our review and comment by early October 2007. We will meet shortly after that to develop a path forward. This pathway will very likely include additional monitoring wells that will be necessary to demonstrate system performance and contaminant migration behavior. Additional wells will also necessitate the need for additional monitoring (perhaps four quarters of data) to provide the necessary trend data.

That's it in a nutshell.

We'll know more when we hear back from the PLP group later this month (September 2007). We'll keep you informed of progress/status.

Dave